

REMARKS/ARGUMENTS

Applicant submits this Amendment and Response in response to the Office Action mailed November 17, 2004, in which the Examiner rejected Claims 16-29 and 33-43. Claims 1-14, 32 and 44-46 were previously canceled, and claims 15, 30 and 31 were previously withdrawn. Claims 16-29 and 33-43 are currently pending in this application.

The Examiner rejected independent Claim 16 and dependent Claims 17-28 under 35 U.S.C. §102(b) as being anticipated by JP 5-70092A. As suggested by the Examiner in the February 2, 2005 interview ("Interview"), independent Claim 16 was amended to describe the inner surface as the surface that makes contact with one or more of the rollers. The Examiner indicated in the Interview that the back inner surface as previously described, could be interpreted to be analogous to surface 1 of Figure 6 of the JP 5-70092A reference, which, as illustrated, is substantially parallel to the front surface of the carriage. However, the back inner surface of this invention is in fact analogous to surface 5 of Figure 6 of the JP 5-70092A, which is not substantially parallel to the front surface of the carriage. JP 5-70092A does not disclose or suggest a straight back inner surface. Thus, the amendment traverses the Examiner's rejection of Claim 16 based on JP 5-70092A, as well as Claims 17-28 which are dependent on Claim 16.

The Examiner rejected independent Claims 16, 33, 34 and 41 and dependent Claims 17-27, 35, 36, 38-40, 42 and 43 under 35 U.S.C. §102(b) as being anticipated by Yarris '104, Yarris '040, and/or Kelly '815. As suggested by the Examiner in the Interview, independent Claims 16, 33, 34 and 41 were amended to delete the term "about" in the description of the angle measurements. The Examiner indicated in the Interview that use of the term "about" with the various angle measurements could be interpreted to

encompass 89.9°. Thus, this amendment traverses the Examiner's rejection of Claims 16, 33, 34 and 41, as well as dependent Claims 17-29, 35-40 and 42-43 for the following reasons.

First, both Yarris '104 and Yarris '040 do not disclose or suggest an angled front inner surface, but instead disclose front inner surfaces and back inner surfaces that are both substantially normal to the lateral inner surfaces. U.S. Patent No. 4,124,104, col. 3, ll. 42-47; U.S. Patent No. 4,035,040, col. 2, ll.13-17.

Second, Kelly does not disclose or suggest an angled front inner surface and a lateral inner surface that is substantially normal to the front surface of the carriage. Rather, Kelly discloses a straight front inner surface and an angled or "tapered" lateral inner surface. U.S. Patent No. Re. 30,815, Figures 5A-5C; col. 3, ll. 47-51.

Independent Claim 41 was also amended to correct minor editorial problems, specifically to consistently define the second angle as that between the front surface of the carriage and the plane defined by the rotation of the first upper roller.

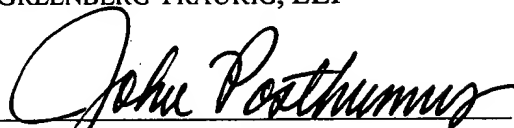
It is thus believed that the present Amendment addresses each of the rejections issued by the Examiner in the present Office action and places the claims in condition for allowance. In conjunction with this belief, Applicant respectfully submits that all of the pending claims after this Amendment are allowable and Applicant respectfully requests a Notice of Allowability be issued in this case.

If the Examiner has any questions or comments, he is invited to contact Applicant's undersigned representative at the telephone number indicated below. If the payment included with this Amendment (or lack thereof) is insufficient or an overpayment of the fees due, please make up the insufficiency or credit Deposit Account

No. 502775 as applicable. This is NOT an authorization to withdraw any issue fee from the Deposit Account.

Respectfully submitted this 17th day of February, 2005.

GREENBERG TRAURIG, LLP

A handwritten signature in black ink, reading "John R. Posthumus", written over a horizontal line.

John R. Posthumus, Esq.

Reg. No. 36,245

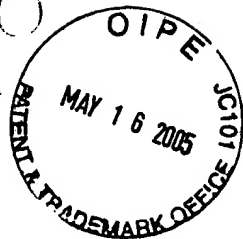
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DEN-SRV01\167504v01\2/17/05\65402.010100

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File No.: 65402-010100

Re: U.S. Patent Application Serial No. 09/960,712; Applicant: Simpson, et al.

Date: February 17, 2005 10:28 AM

No. Pages: Including Cover Sheet 14

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